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G. DUKES SCOTT
EXECUTIVE DIRECTOR

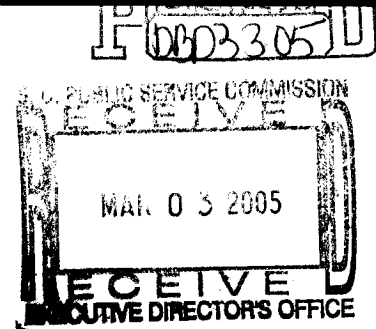
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FLORENCE P. BELSER
GENERAL COUNSEL



March 1, 2005

The Honorable Charles L. A. Terreni
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Dr., Suite 100
Columbia, SC 29210

RE: Docket No. 2005-15-C – Generic Proceeding Established Pursuant to
Commission Order No. 2004-466 to Address the Appropriate Rate
Classification or Rate Structure for Telephone Lines Located in Elevators
and For Telephone Lines Located in Proximity to Swimming Pools.

Dear Mr. Terreni:

On February 28, 2005, the Office of Regulatory Staff (“ORS”) received the revised schedule for prefilng of testimony and exhibits in the above-referenced docket. This docket was established by Commission Order No, 2004-466, dated October 5, 2004. By its Order No. 2004-466, the Commission established the present generic docket to address the appropriate rate classifications or rate structure for telephone lines located in elevators and for telephone lines located in proximity to swimming pools.

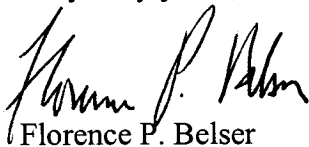
By this letter, ORS respectfully requests that the Commission amend the prefilng dates set forth in the memo of February 28, 2005, to require all parties to prefile testimony and exhibits on the same date. The present docket is a generic proceeding established by the Commission. As a generic proceeding, neither ORS nor any other party has the burden of proof. As stated in Order No. 2004-466, the instant generic docket was established “so that the Commission may receive relevant information related to the potential impact of reclassification of these types of telephone lines, i.e. those telephone lines required by regulation or code for safety emergency use, such as telephone lines required to be located in elevators or in proximity to swimming pools.” Therefore, parties will offer relevant information on the issues and guidelines set forth in Order No. 2004-466 and the Revised Notice of Filing and Hearing issued on January 31, 2005. While parties may desire that the Commission adopt a particular view or position, no party has a burden of

proof in the proceeding. Because no party has the ultimate burden of proof in this case, all parties should be required to prefile their testimony at the same time.

Additionally, because this proceeding is a generic proceeding in which no specific party has the ultimate burden of proof, there is no need for surrebuttal testimony. Generally, rebuttal testimony is a matter of right for a party having the burden of proof, and it could certainly be argued that because no party has the burden of proof there is no need for rebuttal testimony as well. However, ORS recognizes that some parties may wish to respond to testimony or positions offered by other parties, and therefore, ORS suggests that any deadline by which to file rebuttal testimony be the same for all parties as well.

Thank you for your consideration of this request. With warmest regards, I am

Very truly yours,

A handwritten signature in black ink, appearing to read "Florence P. Belser". The signature is fluid and cursive, with the first name "Florence" and last name "Belser" clearly distinguishable.

Florence P. Belser
General Counsel

cc: John F. Beach, Esquire
Stan Bugner
Scott Elliott, Esquire
Margaret M. Fox, Esquire
Steven W. Hamm, Esquire
Patrick W. Turner, Esquire
Rufus S. Watson, Jr.